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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SOMPO JAPAN INSURANCE, INC.,	:	
<i>Plaintiff,</i>	:	06 Civ. 7605 (WHP)
- against -	:	
M/V FEI HE, M/V COSCO KIKU, SEA TRADE INTERNATIONAL, INC., and COSCO CONTAINER LINES CO., LTD.,	:	<u>JOINT SCHEDULING REPORT</u>
<i>Defendant.</i>	:	

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Plaintiff, Sompo Japan Insurance, Inc., and Defendants SeaTrade International, Inc., and COSCO Container Lines Co., Ltd., through respective undersigned counsel, submit their Joint Scheduling Report as follows:

1. Description of the Case

a. Attorneys:

For the Plaintiffs:
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Attorneys for Defendant
Sea Trade International, Inc.

b. Plaintiff alleges Federal jurisdiction is based on 28 U.S.C. § 1333 – breach of contract of carriage of goods by sea.

c. Plaintiff is a subrogated underwriter of the shipper of a cargo of scallops who seeks recovery of \$130,000 plus interest and costs for damage allegedly occurring en route from Boston to Japan.

2. Proposed case management plan

- a) Pending motions: none
- b) Deadline for joinder of additional parties: January 31, 2008.
- c) Deadline for amendments to pleadings: January 31, 2008.
- d) (i) Rule 26 (a) (1) Disclosures shall be served by December 11, 2007.

- (ii) Factual discovery shall be completed by March 15, 2008.
- (iii) The parties shall identify its experts by February 15, 2008.
- (iv) Expert reports shall be served by March 31, 2008.
- (v) Expert discovery shall be completed by April 15, 2008.
- e) Final pretrial order shall be filed by April 30, 2008.
- f) The parties agree that service of papers can also be made by e-mail or fax.

Dated: Rye, New York
December 6, 2007

MALOOF BROWNE & EAGAN LLC

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*Attorneys for Defendant Sea Trade
International, Inc.*

SO ORDERED:

U.S.D.J.

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